

### REMARKS

In the Office Action, claim 1 is rejected under 35 U.S.C. §112 because of the phrase “orthogonal”, claims 1, 15, 16, 19, 20, 21 and 23 rejected under 35 U.S.C. §103(a) as being unpatentable over Harada in view of Chao et al., claims 4-6, 17-18 and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Harada in view of Chao et al. and further in view of Keely et al., claim 7 is rejected under 35 U.S.C. §103(a) as being unpatentable over Harada in view of Chao et al. and further in view of Binstead, and claims 11 and 12 are rejected under 35 U.S.C. §103(a) as being unpatentable over Harada in view of Chao et al. and further in view of Yamazaki et al..

In response to the rejection under 35 U.S.C. §112, applicant respectfully points out that the limitation of “a second direction orthogonal to said first direction” in claim 1 is fully supported by the conventional X and Y axes used in the coordinate system described in paragraph [0039] and shown in figures 4-6 of the specification of the instant invention. As is well practiced and widely accepted in scientific and engineering literatures, X and Y axes are “perpendicular” to each other with X and Y directions being “orthogonal”. To overcome the rejection, paragraph [0039] of the present specification is further amended to describe that X and Y axes shown in various figures are perpendicular and to include the phrase “orthogonal”. Applicant respectfully requests the withdrawn of the rejection under 35 U.S.C. §112.

In the detailed office action, the examiner admits that Harada Publication fails to teach “**electromagnetic induction layer including a wire lattice formed by first wires**

winded along a first direction and second wires wound along a second direction orthogonal to said first direction, said first and second wires being interlaced separately” of claim 1 but cites Chao Publication as having disclosed such limitations. Applicant would like to note that the wound wires of Chao have a completely different physical structure which relies on different working principles in comparison with the instant invention.

With reference to Figures 3-6 of the instant invention, the “wires wound” defined in Claim 1 in the present application is a wire lattice with longitudes and latitudes formed by first wires wound along a first direction and second wires wound along a second direction orthogonal to said first direction through the reference columns. Specifically, as shown in the Fig. 3-6 and recorded in the paragraph [0042] of the present application, “the induction layer 4 may be a wire lattice wound and interlaced by the wires 52 along the X axis and the wires 51 along the Y axis, and the wires are insulated with each other at the crossing points 54”. As illustrated in Figs. 6 and 7, **longitudes and latitudes cross each other across the entire display screen.**

As shown in FIG. 2C and described in paragraph [0027] of Chao publication, the layout of the antenna loop along the X-direction is formed by crossing the plurality of dummy closed regions 250A, 250B and 250C from each other with the interlacing methods; besides, that along the Y-direction is formed by crossing the plurality of dummy closed sections 270A, 270B, and 270C from each other with the same method. More specifically, the wound wire 200A does not form longitudes and the wound

**wire 200B does not form latitudes.** Both winded wires 200A and 200B are winded with unique and complex patterns that are completely different from the instant invention.

Accordingly, claim 1 is amended to recite that **first wires winded along a first direction with longitudes across the display screen and second wires winded along a second direction orthogonal to said first direction with latitudes across the display screen, said first and second wires being interlaced separately with said longitudes crossing said latitudes.** The amended claim 1 has distinctly define the invention in a patentable way to overcome the rejection under 35 U.S.C. §103(a) over Harada in view of Chao et al. Applicant respectfully submits that the amended claim 1 is allowable.

With regards to the rejection of claims 11 and 12, the examiner cites Yamazaki as having disclosed **attaching and fixing said wire lattice on the insulated membrane by thermal pressing or thermal melting** of the instant invention. Applicant respectfully contends that the rejection is unwarranted because Yamazaki shows neither the insulated membrane formed of a “film material” nor the “thermal pressing or melting process”. As described in paragraphs [0360] and [0361] of Yamazaki, the insulating film can be formed by mixing tetraethyl orthosilicate (TEOS) and O<sub>2</sub> by plasma CVD. In other words, the disclosure of Yamazaki is a semiconductor fabrication process for covering a semiconductor layer with an oxide or nitride film. The film material of the instant invention is a film material similar to that used in a camera film, and the thermal pressing or thermal melting is a thermal-mechanical process to attach and fix a wire lattice to the film. They are distinctly different from the film technology used in the semiconductor process taught by Yamazaki.

From the foregoing discussion, it is evident that the instant invention differs from the cited prior arts. The physical difference results in different effects and is not obvious. The amended claim 1 has overcome the rejection under 35 U.S.C. §103(a) over the cited prior arts and should be patentable. By virtue of dependency, claims 4-7 and 15-23 should also be patentable. Claims 2-3 and 8-14 are cancelled. Prompt and favorable reconsideration of the application is respectfully solicited.

Respectfully submitted,

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